U.S. Department of Transportation
United States Coast Guard

Commandant
United States Coast Guard

2100 Second Street, S.W.
Washington, DC 20593-0001
Staff Symbol: (G-MSO-3)
Phone: (202) 267-1217

16703/46-154
17 May 2002

Mr. Jim Stewart, P.E.
LNG Worldwide, Inc.
2202 Oak Shores Drive,
Kingwood, TX 77339

Dear Mr. Stewart:

We are responding to your letter of April 16, 2002 to the Marine Safety Center about the design vapor pressure (P_o) for LNG carriers that are being built with the Gaz Transport membrane, which has been previously reviewed by us. In the letter you asked to use the P_o in the International Gas Carrier (IGC) Code. As discussed below, we will accept the IGC Code P_o of 0.25 bar.

Currently, 46 CFR 154.426 specifies a P_o of 0.245 bar (24.5 kPa). That P_o reflects the original requirement of 0.25 kp/cm^2 in the Gas Carrier (GC) Code. The IGC Code is an updated version of the GC Code, and so the IGC Code uses more modern units. When the GC Code's units of kp/cm^2 were changed to bar in the IGC Code, the approximately 2% increase in P_o was not considered consequential. At the same time, 46 CFR part 154 has always used the more modern units of kPa, and there has been no updating of 46 CFR part 154 as there has been from the GC Code to IGC Code.

In practice, we generally accept the IGC Code in the same manner that 46 CFR part 154 accepts the GC Code. Therefore, we accept that the small increase in P_o is inconsequential, and P_o can be 0.25 bar.

If you have further questions on gas carriers that are subject to special approval by the Commandant (G-MSO), please contact Mr. Tom Felleisen of my staff at (202) 267-0086, or tfelleisen@comdt.uscg.mil.

Sincerely,

JAMES M. MICHALOWSKI
Commander, U.S. Coast Guard
Chief, Hazardous Materials Standards Division
By direction of the Commandant